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[Additional Counsel on Signature Block]

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

SANJAY SAINI, Individually And On Behalf Of All Other Similarly Situated Residents,

:

Plaintiff,

CLASS ACTION

Civil Action No. 12-cv-6105(CCC)(JAD)

VS.

:

BMW OF NORTH AMERICA, LLC,

Defendant.

NOTICE OF PLAINTIFF'S MOTION FOR FINAL APPROVAL OF CLASS <u>ACTION SETTLEMENT</u>

PLEASE TAKE NOTICE that at the Final Approval Hearing scheduled for 11:00 a.m. on March 12, 2015, plaintiff and the Class will move before Hon. Claire C. Cecchi, U.S.D.J., at the U.S. District Court, M.L. King, Jr. Federal Building & Courthouse, 50 Walnut Street, Newark, New Jersey 07102, to have the Court enter

the proposed order submitted herewith that will grant their motion seeking final approval of the class action settlement.

PLEASE TAKE FURTHER NOTICE that plaintiff will rely on the accompanying Memorandum of Law, Declaration of Bruce D. Greenberg,

Declaration of Phil Cooper and other related materials in support of this motion.

PLEASE TAKE FURTHER NOTICE that defendant does not oppose this motion and agrees that the Court should grant final approval of the settlement.

Dated: February 3, 2015 By: /s/ Bruce D. Greenberg

Bruce D. Greenberg

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CERTIFICATE OF SERVICE

I, Bruce D. Greenberg, hereby certify that on February 3, 2015, I caused a copy of (a) Notice of Plaintiff's Motion For Final Approval of The Class Action Settlement; (b) Memorandum of Law in Support of Plaintiff's Motion For Final Approval of The Class Action Settlement; (c) Declaration of Bruce D. Greenberg; and (d) Declaration of Phil Cooper to be served upon all counsel of record through the Court's ECF system.

Dated: February 3, 2015 /s/ Bruce D. Greenberg
Bruce D. Greenberg